



NORTH AMERICA SOUTH AMERICA EUROPE ASIA

1901 L Street, NW
Washington, DC 20036
T +1 (202) 282-5000
F +1 (202) 282-5100

ABBE DAVID LOWELL
Partner
(202) 282-5000

May 24, 2024

VIA ECF

Honorable Jessica G. L. Clarke
United States District Judge
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 20C
New York, NY 10007

Re: *Robert Hunter Biden v. Rudolph W. Giuliani, et al.*, Case No. 1:24-cv-2021 (JGLC)

Dear Judge Clarke:

Pursuant to this Court's Order of April 16, 2024, the Parties in the above-captioned action submit this joint letter addressing "whether they would like to proceed before the Bankruptcy Court or whether the parties intend to file a stipulation of dismissal." (ECF No. 33.)

After communications between counsel and with their respective clients, the Parties intend to file a stipulation of dismissal of the action, without prejudice, and to toll the relevant statutes of limitations for the claims asserted in the action. The Parties anticipate finalizing their tolling agreement and filing a stipulation of dismissal without prejudice within the next ten (10) calendar days.

Respectfully submitted,

/s/ Abbe David Lowell

Winston & Strawn LLP
200 Park Avenue
New York, NY 10166
Telephone: (212) 294-6700
Fax: (212) 294-4700
AbbeLowellPublicOutreach@winston.com

Attorneys for Plaintiff

/s/ Joseph D. Sibley IV

Camara & Sibley LLP
1108 Lavaca St. Suite 110263
Austin, TX 78701
Telephone: (713) 966-6789
Fax: (713) 583-1131
sibley@camarasibley.com

Attorneys for Defendants Giuliani Partners, LLC,
Giuliani Group, LLC, Giuliani Security & Safety,
LLC

WINSTON
& STRAWN
LLP

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/s/ Robert L. Rattet

Davidoff Hutcher & Citron LLP
605 Third Avenue
New York, NY 10158
Telephone: (212) 557-7200
Fax: (212) 286-1884
rlr@dhclegal.com

Attorneys for Defendant Robert J. Costello